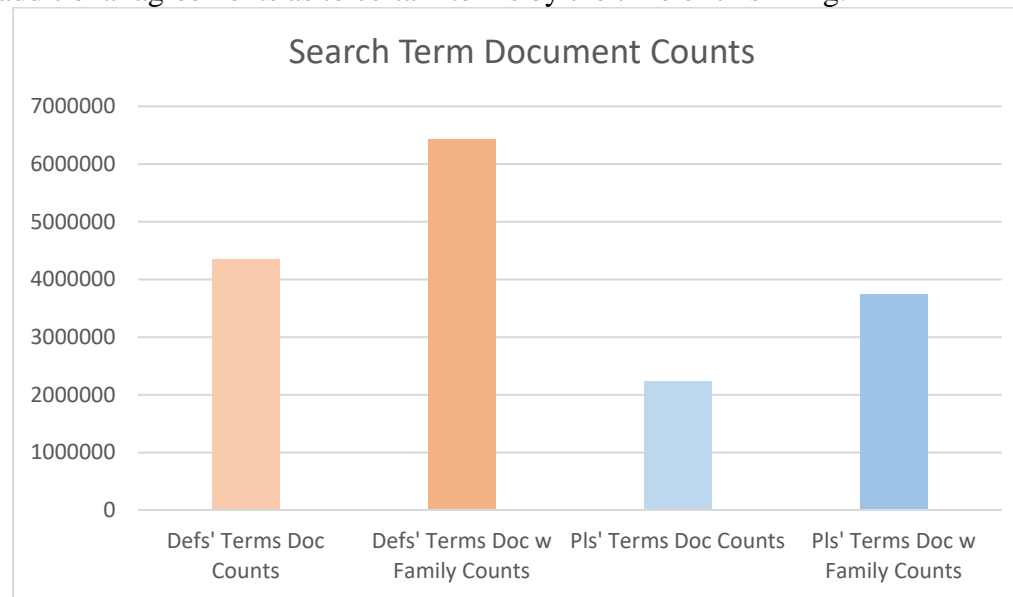


EXHIBIT D

SEARCH TERM PROPOSALS DOCUMENT COUNTS

The below charts provide the document counts for the Parties' respective positions as of October 4, 2024. Plaintiffs did not have sufficient time to rerun hit reports with additional agreements as to certain terms by the time of this filing.



	Defs' Terms Doc Counts	Defs' Terms Doc w Family Counts	Pls' Terms Doc Counts	Pls' Terms Doc w Family Counts
Baltimore	269,585	421,998	151,990	252,684
Breathitt	98,254	132,517	49,312	72,325
Charleston	797,792	1,108,371	407,096	639,931
Chathams	351,423	417,076	178,284	224,450
Dekalb	454,868	987,079	295,174	738,883
Harford	330,154	533,508	175,745	305,245
Hillsborough	568,819	825,145	312,221	501,244
Irvington	217,015	312,943	109,302	174,446
Jordan	327,533	397,748	172,030	219,795
Saint Charles	136,841	170,167	68,610	91,813
Spartanburg	454,566	528,726	166,063	218,179
Tucson	340,128	589,789	149,930	307,343
TOTAL	4,346,978	6,425,067	2,235,757	3,746,338